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EX PARTE OR LATE FILED

February 26, 1997

EX PARTE

Ms. Regina M. Keeney
Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Re: *In the Matter of Intelligent Networks, CC Docket No. 91-346 and In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98*

Dear Ms. Keeney:

The purpose of this letter is twofold. It provides an update regarding implementation of the Industry IN Project[1/] and also requests that the Commission recognize the project as the appropriate path forward in resolving issues associated with intelligent network access. As you may recall, the Industry IN Project was designed as a vehicle to assist the Commission and the industry in resolving issues raised in CC Docket No. 91-346. This project most effectively uses existing resources to gather and objectively assess technical and operational data pertaining to IN interconnection and access. Test data, which will be used in addressing requirements and issues, will be available to the entire industry and will accelerate additional IN development. The Industry IN Project bridges the gap between theory and reality.

A Project Organizing Committee, consisting of representatives from a cross-section of the industry, concluded that the objectives of the project, including the objective of achieving results in the shortest possible time frame, could be accomplished most effectively through a coordinated effort of existing forums. The Committee selected the IN Forum (INF) to work the initial two phases of

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1. *See Ex Parte* Letter filed by Southwestern Bell on behalf of the "Joint LECs" dated June 23, 1995 (providing information on the industry initiative that is now referred to as the Industry IN Project). *See also Ex Parte* Letter filed by Southwestern Bell on behalf of the "Joint LECs" dated May 10, 1996 (providing initial information concerning implementation of the Industry IN Project). The record was further updated in regard to this industry initiative by an *ex parte* letter filed by Pacific Bell on behalf of the "proposing LECs" dated November 5, 1996.

the project (defining requirements and designing laboratory tests). The Alliance for Telecommunications Industry Solutions (ATIS), following reorganization of its Carrier Liaison Committee (CLC), was selected to work the third phase (conducting the tests) since it is a recognized industry/regulator venue.

In October 1996, the Industry IN Project was officially passed to the IN Forum, which then assigned its Technical Committee's IN Interconnection and Access Group (IIAG) to the project. This technical group, consisting of 38 individuals from 22 different companies, has met three times. Two sub-groups were formed, one chaired by GTE and one chaired by AT&T,[2/] to create high-level test designs for Service Control Points (SCPs) to IN-capable Service Switching Points (SSPs) interconnection. Five contributions, including input from IILC issues documents,[3/] provided the initial input and work is underway on the requirements document. The target is to have initial test plans ready to provide to ATIS by the end of the second quarter of 1997.

The next step will be for the IN Forum to establish a formal liaison with ATIS in order to identify roles, establish funding, assign work group responsibility, and other resource requirements. An initial presentation was made by the IN Forum to the NIIF on January 6, 1997.

Since MCI and Sprint are not participating in the project, AT&T's unexpected withdrawal from active participation left the participating LECs without an interexchange carrier (IXC) testing partner. IXC participation is needed to identify requirements, to conduct lab tests of required interconnection alternatives, and to conduct field trials. The same companies that have been the most vocal in asking the Commission to impose specific requirements on the LECs are refusing to cooperate in the very project that will help guide the Commission's decision.

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2. In early February 1997, AT&T's representative on the IIAG informed the IIAG Chairman that AT&T would no longer be able to continue to proactively participate in the activities of the IIAG regarding the Industry IN Project, although it planned to continue to participate in other IN Forum activities.

3. The Information Industry Liaison Committee (IILC), which is part of the ATIS, was recently reorganized into the Network Interconnection/Interoperability Forum (NIIF).

As a result, the progress of the Industry IN Project is in jeopardy. Absent IXC industry segment participation, the LECs will be unable to determine or validate IXC requirements, conduct appropriate tests, or evaluate interconnection alternatives. In an effort to encourage at least one national IXC to reconsider its decision not to participate, the Joint LECs request that the Commission recognize the Industry IN Project as the appropriate path forward in determining the feasibility of proposed interconnection/access alternatives. The Joint LECs have demonstrated their willingness to cooperate in carrying out the objectives of the Industry IN Project and look forward to the Commission's full support of this proactive means of resolving issues pending in CC Docket Nos. 91-346 and 96-98 regarding access to intelligent network.[4]

As has been previously demonstrated in the public record, the IN interconnection arrangements being requested by third parties (e.g., IXCs and new local exchange carriers) raise serious network reliability, network security, and service integrity issues. Therefore, it is essential that all aspects of such interconnection be thoroughly investigated and tested before the Commission acts to make them available.

The Joint LECs stand ready to work within established industry processes to cooperatively evaluate intelligent network interconnection/access alternatives outlined by the Commission in its intelligent network docket. But the LECs cannot do it alone as they cannot determine or validate third party requirements, test interconnection alternatives, or conduct field trials absent participation by at least one national IXC.

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4. *See, e.g.*, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, *First Report & Order*, FCC 96-325, paras. 501-03.

If you need additional information, please do not hesitate to call on me. The Joint LECs will continue to keep you informed as the Industry IN Project continues to evolve.

Sincerely,

Todd Silbergeld
Director-Federal Regulatory

cc: Mr. William F. Caton
Mr. Thomas Boasberg
Mr. James Coltharp
Mr. James Casserly
Mr. Dan Gonzalez
Mr. A. Richard Metzger, Jr.
Mr. Richard Welch
Mr. Paul Gallant
Mr. Robert Tanner